

- (4) The Petition accurately describes both the company's use of the frequencies, the investment Enbridge has made in purchasing, engineering, and deploying its communications system on the AMTS spectrum, and the harm that Enbridge, its customers, and the surrounding communities would suffer if the company lost use of the AMTS spectrum.
- (5) Enbridge owns and operates one of the longest and most sophisticated oil and liquids transportation systems in the world. The company's operations in east Texas and western Louisiana (which is the territory covered by the AMTS spectrum) consist of gathering natural gas from wellheads, treating and processing the gas for delivery into intrastate or interstate pipelines for transmission to wholesale customers such as power plants, industrial customers, and local distribution companies.
- (6) The service territory Enbridge purchased from Maritime Communications/Land Mobile, LLC ("Maritime") in 2010, includes rural areas and more populated areas near Dallas and Houston, Texas. The challenge of covering both rural and more populated areas led Enbridge to acquire AMTS spectrum from Maritime.
- (7) Enbridge has invested more than \$4.4 million in deploying the AMTS system. These investment costs including purchasing equipment, leasing tower space, working with contractors to engineer the system, and deploy the equipment. The company continues to deploy additional sites within its service territory and continues to invest in the AMTS system.
- (8) Enbridge currently is operating the AMTS system pursuant to a spectrum lease with Maritime. The company intends to purchase the spectrum from Maritime so it can enjoy the certainty of having its own license. To date, the company has paid Maritime only 10 percent of the purchase price for this spectrum and would be willing to pay the balance (more than \$1 million) into an escrow account pending the resolution of the Commission's hearing proceeding.
- (9) The two primary purposes of this network are to enable Enbridge to (i) comply with the President's Executive Order on cybersecurity (Executive Order 13636) issued in 2013, and (ii) protect its workers, the surrounding environment, and population.
- (10) Enbridge is committed to meeting the President's cybersecurity goals and has made significant progress toward meeting those goals. The company is aware of no other alternative spectrum available to help the company meet the President's cybersecurity goals in a timely manner.
- (11) The public safety components of Enbridge's system are significant. The network was designed to monitor hydrogen sulfide (H₂S) leaks along its pipeline system in work facilities owned and operated by Enbridge, as well as surrounding rural areas and major population centers. H₂S is an incredibly dangerous gas that can be fatal within a matter of minutes following low-level exposure. The AMTS system helps Enbridge monitor

H₂S in its pipeline system and maintain the safety of its employees as well as the domestic population surrounding its facilities and pipelines.

- (12) In addition, Enbridge uses the AMTS spectrum to ensure the physical safety of its assets. The spectrum supports video monitoring, snap shot cameras, motion sensors, intruder alerts, security gate access, and badge identification. The purpose of these operations also is public safety.
- (13) The ability of Enbridge to comply with the President's cybersecurity Executive Order would be significantly crippled (if not made completely impossible) by loss of this spectrum.
- (14) A final component of the system supports the company's monitoring and controlling of valves and switches necessary to operate and maintain its pipelines in compliance with federal and state requirements. These control operations were the first portion of Enbridge's operations deployed on the AMTS spectrum when it filed its original Petition for Reconsideration 3 ½ years ago. Currently, these control operations rely on a small portion of the AMTS spectrum and are not the primary operations on the AMTS spectrum.
- (15) Loss of the AMTS spectrum would also jeopardize public safety. It could result in potentially disastrous consequences for Enbridge's personnel and, perhaps more importantly, the environment and population surrounding Enbridge's facilities and pipelines in east Texas.

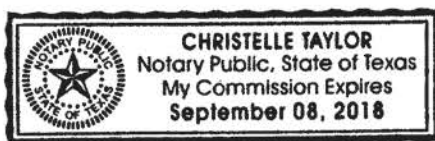

Joel Prochaska
Operations Manager

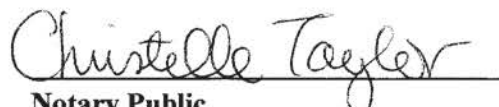
STATE OF TEXAS

CITY/COUNTY OF Houston/Harris, to wit:

Subscribed and sworn to on this 13 day of October, 2014, by Joel Prochaska,
Operations Manager for Enbridge, the above-named Affiant, before me.

My Commission expires on: 9/08/18




Notary Public

CERTIFICATE OF SERVICE

I, Beverly Harding, hereby certify that on this 14th of October, a copy of the foregoing Petition for Reconsideration was filed with the Commission, served on the parties listed below via First Class U.S. Mail and a courtesy copy was provided via electronic mail.

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